# Exhibit O

From: Mark Buckson

To: <u>usdoj.gov</u>

Cc: Christopher Clark; Margaret Bray; April Smith
Subject: RE: [EXTERNAL EMAIL] Regarding
Date: Friday, June 9, 2023 3:11:36 PM

## Hi Shannon,

Her Honor wanted me to relay to you that she is not comfortable proceeding in the way that had been discussed earlier and would like the standard procedures followed. Once the documents are filed, case is opened, etc., the parties can request a hearing and we will proceed from there.

Mark Buckson Courtroom Deputy

From: Maryellen Noreika

**Sent:** Friday, June 9, 2023 9:43 AM **To:** usdoj.gov

Cc: Christopher Clark <clark@csvllp.com>; Margaret Bray

Mark Buckson ; April Smith

Subject: Re: Regarding

Ms. Hanson —

Please send information to my Courtroom Deputy and Case Manager. We do not usually accept information sent only to my private email address.

I do not know when I will have a chance to review, but we will let you know if Tuesday works for us after I have been able to do so.

Thank you.

Maryellen Noreika

On Jun 8, 2023, at 7:38 PM, Hanson, Shannon (USADE) wrote:

#### **CAUTION - EXTERNAL:**

Dear Judge Noreika:

Our sincere apologies for the delay in getting these draft documents to you for review.

We have been working diligently today with defense counsel, Mr. Christopher Clark, cced above, to finalize their content. The attached are in final form, with exception of the signature blocks.

Accordingly, please find:

### Tax:

- 1. An Information charging two misdemeanor tax offenses, in violation of Title 26, United States Code, Section 7203
- 2. A Memorandum of Plea Agreement for the tax offenses, including a standard Attachment A and a Statement of Facts (Exhibit 1).

#### Firearm:

- 1. An Information charging one gun offense, in violation of 18 U.S.C. Section 922(g) (3).
- 2. A Pretrial Diversion Agreement for the gun offense, including a Statement of Facts (Attachment A).

We anticipate filing the signed documents with the Court on Tuesday.

You will notice that the Pretrial Diversion Agreement contemplates approval by the U.S. Probation and Pretrial Services Office. We have been speaking with Margi Bray, Chief U.S. Probation Officer. Through her diligence, we hope to have the requisite pretrial diversion report completed prior to the hearing, currently tentatively scheduled for Tuesday, June 13<sup>th</sup> at 4:00 p.m.

We are available at the call of the Court.

Respectfully submitted,

Shannon Hanson

Shannon T. Hanson First Assistant U.S. Attorney U.S. Attorney's Office for the District of Delaware 1313 N. Market Street, Suite 400 Wilmington, DE 19801

302 573 6669 (desk)

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.